

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ALEKSANDR SOROKIN

Plaintiff,

-against-

ROBERT HAUPERT-KEILL

Defendants.
-----X

COMPLAINT

JURY DEMANDED

Docket No.:

Plaintiff, by his attorneys, **LAW OFFICES OF WILLIAM PAGER**, complaining of the defendant, respectfully alleges, upon information and belief:

JURISDICTIONAL STATEMENT

1. That jurisdiction herein exists based upon the complete diversity of citizenship, in that the plaintiff and the defendant are citizens of different states.
2. That at all times herein mentioned, Plaintiff **ALEKSANDR SOROKIN** was, and still is, a resident of the County of Kings, State of New York.
3. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** was, and still is, a resident of the County of Wayne, State of Pennsylvania.
4. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** was the owner of a 1993 Jeep motor vehicle bearing Pennsylvania State license plate number 60063AD.
5. The incident complained of herein occurred in the State of Pennsylvania.
6. The amount in controversy exceeds, exclusive of interest and costs, \$150,000.00
7. Jurisdiction exists under Title 28 USCA Section 1332.

AS AND FOR A FIRST CAUSE OF ACTION

ON BEHALF OF ALEKSANDR SOROKIN

8. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** was the operator of a 1993 Jeep motor vehicle bearing Pennsylvania State license plate number 60063AD.

9. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** managed the aforementioned motor vehicle.

10. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** maintained the aforementioned motor vehicle.

11. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** controlled the aforementioned motor vehicle.

12. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** inspected the aforementioned motor vehicle.

13. That at all times herein mentioned, Defendant **ROBERT HAUPERT-KEILL** repaired the aforementioned motor vehicle.

14. That at all times herein mentioned, Plaintiff **ALEKSANDR SOROKIN** was the owner and operator of a 2017 Lexus motor vehicle bearing New York State license plate number FFF6411.

15. That at all times herein mentioned, and on July 9, 2022, at or about Route 6, at or near Grand Army of the Republic Highway West of Pedersen Pond East, in the County of Pike, State of Pennsylvania, were public streets, roadways and/or thoroughfares.

16. That at all times herein mentioned, and on July 9, 2022, Defendant **ROBERT HAUPERT-KEILL** was operating his motor vehicle at the aforementioned location.

17. That at all times herein mentioned, and on July 9, 2022, Plaintiff **ALEKSANDR SOROKIN** was operating his motor vehicle at the aforementioned location.

18. That at all times herein mentioned, and on July 9, 2022, the motor vehicle owned and operated by Defendant **ROBERT HAUPERT-KEILL** was involved in a collision with the motor vehicle owned and operated by Plaintiff **ALEKSANDR SOROKIN** at the aforementioned location.

19. That as a result of the aforesaid contact, Plaintiff **ALEKSANDR SOROKIN** was injured.

20. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant without any fault or negligence on the part of the Plaintiff contributing thereto.

21. That Defendant was negligent, careless, reckless and grossly negligent in the ownership, operation, management, maintenance, supervision, inspection, repair, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless under the circumstances then and there prevailing.

22. That by reason of the foregoing, Plaintiff **ALEKSANDR SOROKIN** sustained severe and permanent personal injuries and was otherwise damaged.

23. That Plaintiff **ALEKSANDR SOROKIN** sustained serious injuries.

24. That Plaintiff **ALEKSANDR SOROKIN** is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is seeking to recover only those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

25. That this action falls within one or more of the exceptions set forth in CPLR §1602.

26. That by reason of the foregoing, Plaintiff **ALEKSANDR SOROKIN** has been damaged in the amount of FIVE MILLION (\$5,000,000.00) DOLLARS.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands a trial by jury on all claims in this action.

Dated: Brooklyn, New York
September 15, 2022

Yours, etc.

Law Offices of William Pager
Attorneys for Plaintiff
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Our File No. 4567IM